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Attorneys for the WTCP Plaintiffs  
World Trade Center Properties LLC  
1 World Trade Center LLC  
2 World Trade Center LLC  
3 World Trade Center LLC  
4 World Trade Center LLC

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION	:	21 MC 101 (AKH)
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WORLD TRADE CENTER PROPERTIES LLC,	:	
et al.,	:	
	:	08 CIV 3719 (AKH)
Plaintiffs,	:	
	:	<b>NOTICE OF MOTION FOR</b>
v.	:	<b>CERTIFICATION PURSUANT</b>
UNITED AIRLINES, INC., et al.,	:	<b><u>TO 28 U.S.C. § 1292(b)</u></b>
	:	
Defendants.	:	
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WORLD TRADE CENTER PROPERTIES LLC	:	08 CIV 3722 (AKH)
et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
AMERICAN AIRLINES, INC., et al.,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Thomas A. Egan, Esq. and WTCP Plaintiffs' Memorandum of Law in Support of Motion for Certification Pursuant to 28 U.S.C. § 1292(b), and all prior pleadings and proceedings had herein, plaintiffs World

Trade Center Properties LLC, 1 World Trade Center LLC, 2 World Trade Center LLC, 3 World Trade Center LLC (formerly known as 5 World Trade Center LLC), and 4 World Trade Center LLC (collectively, the “WTCP Plaintiffs”), by their attorneys, Flemming Zulack Williamson Zauderer LLP, move this Court for an Order certifying the following Orders of this Court for immediate interlocutory appeal pursuant to 28 U.S.C. § 1292(b): (1) the August 28, 2008 Order Regulating Admissible Evidence on Motion for Summary Judgment, (2) the December 10, 2008 Opinion Granting in Part and Denying in Part Motion for Summary Judgment Regarding Damages (590 F. Supp. 2d 535 (S.D.N.Y. 2008)), (3) the April 29, 2009 Order Reclassifying and Denying World Trade Center Properties Plaintiffs’ Motion for Reconsideration (2009 WL 1181057 (S.D.N.Y. Apr. 30, 2009)), (4) the May 26, 2009 Order Denying Motion for Reconsideration or for § 1292(b) Certification, and (5) the September 30, 2009 Summary Order Regarding Motion for Collateral Setoff and Summary Judgment.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1(b) the WTCP Plaintiffs also move for an expedited briefing schedule so that the issues certified for appeal can be consolidated with the pending appeal from the Court’s order approving the settlement of the Aviation Defendants and certain other property damage plaintiffs, as to which the Court has already directed an expedited appellate briefing schedule. If this request for an expedited briefing schedule is not granted, opposing papers, if any, shall be served within ten

business days after the service of these moving papers, and any reply papers shall be served within five business days after the service of such answering papers.

Dated: September 28, 2010  
New York, New York

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